

Jerry L. Marks (SBN 135395)
Email: jmarks@milbank.com
Aaron Renenger (SBN 222675)
Email: arenenger@milbank.com
MILBANK, TWEED, HADLEY & McCLOY LLP
601 S. Figueroa Street, 30th Floor
Los Angeles, California 90017
Telephone: (213) 892-4000
Facsimile: (213) 629-5063

David R. Gelfand (*admitted pro hac vice*)
Email: dgelfand@milbank.com
Rachel Penski Fissell (*admitted pro hac vice*)
Email: rfissell@milbank.com
MILBANK, TWEED, HADLEY & McCLOY LLP
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000
Facsimile: (212) 822-5661
*Attorneys for Defendants STA Development, LLC,
Solar Trust of America, LLC, Solar Millennium, Inc.,
CA I-10 Solar, LLC, Palo Verde Solar I, LLC,
Palo Verde Solar II, LLC, Blythe Solar Power Project
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MMR GROUP, INC.,
MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC,

Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
SOLAR MILLENNIUM, INC., CA I-10
SOLAR, LLC, PALO VERDE SOLAR I, LLC,
PALO VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**CORRECTED FIFTH STIPULATION
TO EXTEND DEFENDANTS' TIME
TO RESPOND TO AMENDED
COMPLAINT AND [PROPOSED]
ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request that the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by eight days from December 19, 2011 to December 27, 2012.

On November 4th and 14th, the parties requested, and this Court later granted, a one-week extension of time for the STAD Defendants to respond to the Amended Complaint because the parties were in advanced stages of settlement discussions. On November 22nd and December 1st, the parties requested, and this Court later granted, extensions of two weeks due to continued progress in settlement negotiations. The timing of finalizing a settlement has been impacted by several complex factors, but the parties continue to be hopeful that they will execute a settlement agreement forthwith. Due to the upcoming holidays and the continued progress in reaching a settlement, the parties request an eight day extension of the time for the STAD Defendants to respond to the Amended Complaint. The parties’ request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants’ time to respond to the Amended Complaint by eight days from December 19, 2011 to December 27, 2012.

1 Dated: December 19, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Rachel Penski Fissell

3 Jerry L. Marks (SBN 135395)
4 Aaron Renenger (SBN 222675)
5 601 S. Figueroa Street, 30th Floor
6 Los Angeles, California 90017
7 Telephone: (213) 892-4000
8 Facsimile: (213) 629-5063

9 David R. Gelfand (*admitted pro hac vice*)
10 Rachel Penski Fissell (*admitted pro hac vice*)
11 1 Chase Manhattan Plaza
12 New York, NY 10005
13 Telephone: (212) 530-5000
14 Facsimile: (212) 822-5661

15 *Attorneys for Defendants STA Development, LLC,*
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18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and*
21 *Blythe Solar Power Project Unit 4, LLC*

22 Dated: December 19, 2011

**WATT, TIEDER, HOFFAR
& FITZGERALD, LLP**

23 By: /s/ Nicholas A. Merrell

24 Bennett J. Lee (CA Bar No. 230482)
25 Nicholas A. Merrell (CA Bar No. 240795)
26 Regina A. Verducci (CA Bar No. 264996)
27 333 Bush Street, Suite 1500
28 San Francisco, CA 94104
Telephone: 415-623-7000
Facsimile: 415-623-7001

*Attorneys for Plaintiffs MMR Group, Inc., MMR Power
Solutions, LLC and Southwestern Power Group II, LLC*

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: 12/19/11

31 UNITED STATES

